

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

MICHAEL DOBKIN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NRG RESIDENTIAL SOLAR SOLUTIONS
LLC, a Delaware limited liability company,

Defendant.

ERICA GENNARINI, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NRG RESIDENTIAL SOLAR SOLUTIONS
LLC, a Delaware limited liability company,

Defendant.

**MOTION FOR AN ORDER TO SHOW
CAUSE**

Case No.: 1:17-mc-00005.

[Underlying Action currently pending—Case
No. 3:15-cv-05089-BRM-LHG; Hon. Judge
Brian R. Martinotti]

Michael Dobkin and Erica Gennarini (collectively, “Plaintiffs in the Underlying Action” or “Plaintiffs”), by and through their attorneys and pursuant to Rule 45 of the Federal Rules of Civil Procedure, hereby respectfully move this Honorable Court for an order requiring One Touch Calls, LLC (“One Touch”) to show cause for its failure to comply with subpoenas properly issued by Plaintiffs in the Underlying Action which were served within this judicial district. Plaintiffs’ motion is based upon this motion, the memorandum of points and authorities, and the accompanying exhibits, along with any oral argument that may be presented to the Court, and any evidence submitted in connection therewith at the hearing on this motion.

WHEREFORE, Plaintiffs in the Underlying Action respectfully request that the Court enter an Order (i) requiring One Touch to show cause as to why it should not be held in contempt of Court, (ii) imposing appropriate sanctions should it fail to do so, and (iii) granting any additional relief the Court deems reasonable and just.

Respectfully submitted,
MICHAEL DOBKIN and ERICA GENNARINI,

Dated: March 16, 2017

By: /s/ Warner F. Young, III
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* Admission *pro hac vice* to be sought

CERTIFICATE OF SERVICE

I, Warner Young III, an attorney, hereby certify that on March 16, 2017, I caused to be served the above and foregoing ***Motion for an Order to Show Cause***, by causing a true and accurate copy of such paper to be filed and transmitted to all individuals listed below via electronic mail and U.S. Mail, on this 16th day of March 2017.

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By: /s/ Warner F. Young, III
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